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May 15, 2020

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Minh Quang Pham*
12 Cr. 423 (AJN)

Dear Judge Nathan:

The parties jointly provide this update pursuant to the Court's memo endorsement of my letter dated April 6, 2020. The parties are continuing discussions concerning how to proceed in this case in light of *United States v. Davis*, 588 U.S. ___, 2019 WL 2570623 (June 24, 2019). Consultations between Mr. Pham and counsel, which are complicated due to Mr. Pham's incarceration at the ADX maximum security facility in Florence, Colorado, are even more difficult due to the COVID-19 pandemic.

I need additional time to consult with Mr. Pham and review documents with him. A long-standing request for a legal call has just been scheduled for May 21st. Due to ongoing logistical impediments caused by the COVID-19 epidemic, I am still unable to obtain assistance to review files requested by Mr. Pham that require use of a complex software program.

In light of the ongoing pandemic, the parties jointly request additional time for Mr. Pham to confer with counsel. We propose providing a status update for the Court on or before June 29, 2020.

Your consideration is greatly appreciated. All best wishes for continued good health during these trying times.

Very truly yours,
/s/

BOBBI C. STERNHEIM

cc: AUSA Anna Skotko